Portland Harbor Feasibility Study

Presentation to the CSTAG/NRRB
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Portland Harbor

Identification and Screening of Technologies

ARARs – Chemical Specific

- Protection of surface water
 - National and State WQS criteria
 - WA freshwater sediment criteria (TBC)
- Protection of potential drinking water
 - MCLs & non-zero MCLGs
- State measure of protectiveness
 - 1 x 10⁻⁶ individual contaminant
 - 1 x 10⁻⁵ cumulative contaminant
 - HI = 1

ARARs – Location Specific

- Presence of archaeologically or historically sensitive area
 - Indian Graves & Archeological Objects
- Floodplain management and wetland protection
 - FEMA
- Protection of ESA species & EFH
 - 5 listed species Willamette
 - Critical habitat Willamette
 - 9 listed species Columbia

ARARs – Action Specific

- Compliance with WQS CWA Section 401
- Discharge pollutants CWA Section 402
- Discharge dredge or fill material CWA Section 404
- DSL Mitigation ORS 196.825(5)
- Federal navigation channel Rivers & Harbors Act
- In-water work window ODFW Management Plan (TBC)
- Disposal
 - Oregon Pesticide Rule
 - Oregon Solid Waste Rule
 - RCRA OR delegated state
 - TSCA
- Air emissions from sediment/soil removal
 - CAA

RAOs – Human Health

- RAO 1 Sediments: Direct contact
- RAO 2 Biota: Consumption of fish and shellfish.
- **RAO 3 Surface Water:** Direct contact (ingestion, inhalation, and dermal contact)
- RAO 4 Groundwater: Reduce migration of contaminated groundwater to sediment and surface water

RAOs - Ecological

- RAO 5 Sediments: Benthic risk
- RAO 6 Biota (Predators): Consumption of prey
- RAO 7 Surface Water: Ingestion and direct contact
- RAO 8 Groundwater: Reduce migration of contaminated groundwater to sediment and surface water

RAOs – Both HH and Eco

• RAO 9 – River Banks: Reduce migration of contaminated river banks to sediment and surface water

COCs

- Further screened COCs from BRAs
- Risk-based and ARAR-based
- 69 COCs total
- Multi-media
 - Sediment
 - Surface water
 - Pore water

COCs

- RAO 1: HH Direct contact
 - Beach 2 COCs
 - Sediment 9 COCs
- RAO 2: HH consumption 17 COCs
- RAO 3: HH Surface Water 21 COCs
- RAO 4: HH Groundwater migration 30 COCs
- RAO 5: Eco Benthic risk 18 COCs
- RAO 6: Eco Biota (Predator) Ingestion 8 COCs
- RAO 7: Eco Surface water 10 COCs
- RAO 8: Eco Direct Contact Pore Water 38 COCs
- RAO 9: Riverbank Recontamination 22 COCs

PRGs - RAO 1 Human Health

Media - Beach

- Receptor Tribal Fisher
- Apply only to beach
- 1 risk-based (cPAHs) @ 10⁻⁶
- 1 background (As)

Media - Sediment

- Receptor Tribal Fisher
- Apply only nearshore
- 8 risk-based (PCBs, cPAHs, dioxin/furans) @ 10⁻⁶
- 1 background (As)

PRGs - RAO 2 Human Health

Media – Fish Tissue

- Receptor Subsistence Fisher
- Apply site-wide
- 9 risk-based @ 10⁻⁶
- 7 risk-based @ HQ=1
- 1 ARAR-based (mercury)

Media - Sediment

- Receptor Subsistence Fisher
- Apply site-wide
- 5 risk-based @ 10⁻⁶
- 1 risk-based @ HQ=1
- 5 background

PRGs - RAO 3 Human Health

- Media Surface Water
- Apply site-wide
- 1 risk-based (MCPP) @ 10⁻⁶
- 19 ARAR-based (AWQC)

PRGs - RAO 4 Human Health

- Media Pore water
- Apply site-wide
- 5 ARAR-based (MCLs)
- 25 ARAR-based (AWQC)

PRGs - RAO 5 Eco

- Media Sediment
- Receptor Benthic organism
- Apply site-wide
- 18 ARAR-based (WA Freshwater)

PRGs - RAO 6 Eco

- Media Sediment
- Apply site-wide
- Receptor Spotted Sandpiper
 - 1 risk-based (DDx)
- Receptor Osprey (egg)
 - 5 risk-based (4,4'-DDE, dioxin/furans)
- Receptor River Otter
 - 1 risk-based (HxCDF)
- Receptor Mink
 - 1 risk-based (PCBs)

PRGs – RAO 7 Eco

- Media Surface Water
- Receptor Aquatic life
- Apply site-wide
- 9 risk-based (BERA TRV)
- 1 ARAR-based (AWQC) TBT

PRGs - RAO 8 Eco

- Media Pore water
- Receptor Aquatic life
- Apply site-wide
- 34 risk-based (BERA TRV)
- 4 ARAR-based (AWQC)

PRGs – RAO 9 Eco

- Media river banks
- Receptors Humans and Eco
- Apply to riverbanks
- Combined PRGs from RAOs 1, 2, 5, & 6
- 22 PRGs

Target Areas

- Human Health 2,190 acres (entire site)
- Ecological 1,520 acres (60% of site)

Representative Technologies

- No Action
- ICs
 - Fish consumption advisory
 - Waterway & land use restriction
- MNR
 - Deposition & dispersion
- EMNR
- Containment
 - Engineered, armored, & reactive

- Removal
 - Mechanical
- In-situ treatment
 - GAC & organophilic mats
- Ex-situ treatment
 - Sequestration & thermal desorption
- Disposal
 - CDF (Terminal 4)
 - Subtitle D
 - Subtitle C

Portland Harbor

Development and Screening of Alternatives

Development of Alternatives

- Combination of technologies
 - Used for all alternatives, except Alternative A
- Technologies include:
 - Dredging
 - Capping
 - In-situ treatment
 - Ex-situ treatment
 - EMNR
 - MNR
 - ICs

SMA Technologies Considered

- Caps
- Dredging & Excavation
- Dredge/Cap
- Institutional Controls

RALs vs. PRGs

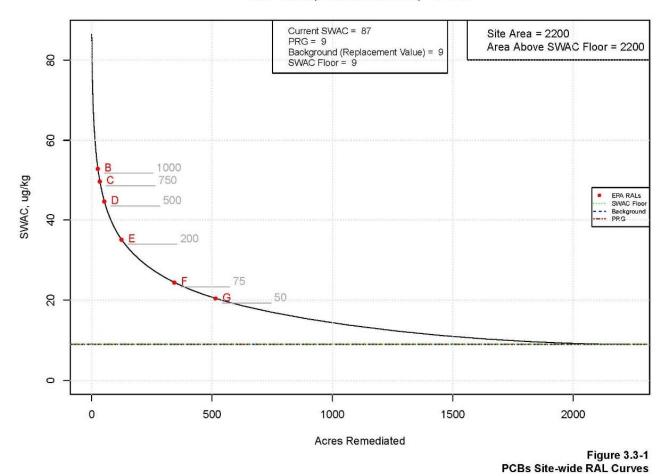
- Entire site (2,190 acres) exceeds PRGs
- RALs are not PRGs
- RALs define dredge/cap areas
- RALs = "high concentration" areas
 - MNR in these areas inconsistent with CSM
- Allows for range of alternatives in FS
 - Less action to more action
 - Identify sediment management areas
- Levels of Active Risk Reduction
 - Maximum incremental reduction
 - Point of minimum concentration change
- MNR/EMNR to achieve RG
- Background considered

Focused COCs

- Subset of COCs with most widespread footprint
 - PCBs
 - PAHs
 - Dioxins/furans
 - > PeCDD
 - > PeCDF
 - > TCDD
 - DDx

Example RAL Curve

Site-wide (Area above PRG) - PCBs



Draft, Deliberative, Do not cite or quote

Issues with Dioxins/Furan RALs

- PRGs below MDL
- Data density
 - False positive RAL footprints
- Consistent method used by PRPs
 - Considered other methods

Remedial Action Levels

Contaminant	В	C	D	E	F	G
PCBs	1,000	750	500	200	75	50
Total PAHs*	170,000	130,000	69,000	35,000	13,000	5,400
1,2,3,7,8-PeCDD	1	1	1	0.2	0.2	0.009
2,3,4,7,8-PeCDF	0.003	0.002	0.0008	0.0008	0.0008	0.0008
2,3,7,8-TCDD	0.002	0.002	0.002	0.0006	0.0006	0.0006
DDx	650	550	450	300	160	40

^{*}Equivalent to cPAH RALs in draft FS. All units $\mu g/kg$.

Technology Assignment

Objective: Develop a process that identified technologies

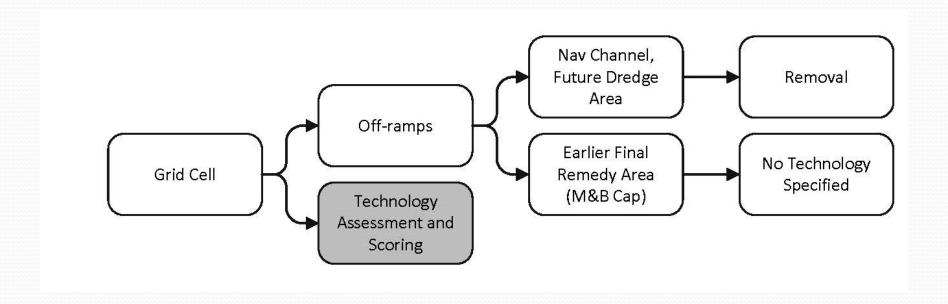
- Based on environmental conditions
 - Hydrodynamics
 - Sediment bed characteristics
 - Anthropogenic conditions
- Uses a decision-based approach:
 - Engineered Cap
 - Armored Cap
 - Dredging

Outcome: Indicates appropriate technology based on analysis... **It does not select a remedy**.

Multi-Criteria Decision Matrix

- Unbiased and reproducible method
- Based on multiple site characteristics
- Uses 10' x 10' grid cells
 - Technology assigned to grid cell
 - Predominant technology
- Scored based on multiple criteria

Overview of Technology Assignment Process



Technology Assignment Matrix

Criteria Scoring

- +1 = technology favorable
- o = technology neutral
- -1 = technology unfavorable
- NC = not applicable

Technology Assessment Scoring			Armor Cap	Сар
Hydrodynamics	Wind/Wave Zone?	4	0	NC
	Erosive?	1		-1
	Depositional? (<2.5cm/year or Subsurface:Surface Ratio>2)?	-1	1	1
	Shallow?	1	-1	0
Sediment Bed Characteristics	Slope 15-30%?	1	1	NC
	Slope >30%	1	0	
	Rock, Cobble, Bedrock Present?	-1	1	1
Anthropogenic Influences	Structures/Pilings?	-1	1	1
	Prop Wash Zone?	1	0	NC
	Moderate or Heavy Debris?	-1	0	1
	Technology Score	Sum Scores for Each Technology		

Hydrodynamics Criteria

Erosive OR Wind/Wave Zone

- Erosive = critical shear stress for 2 year recurrence (flood)
- Wind/wave zone near shore areas

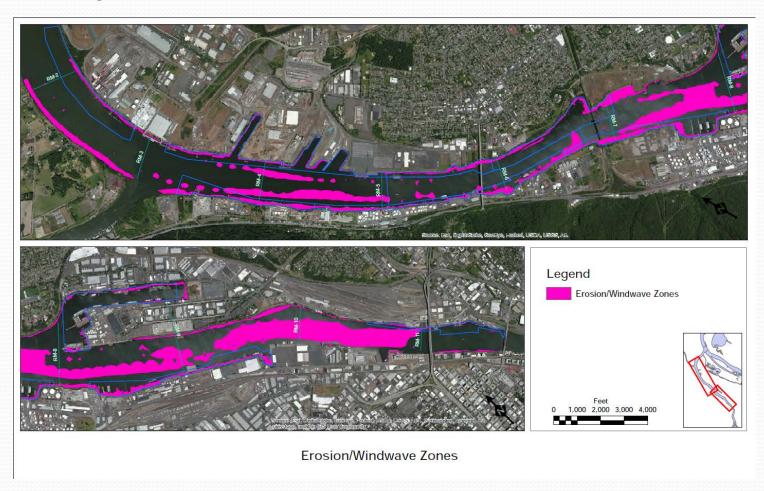
Depositional

- Either depositional (> 2.5cm/yr) May 2003 to 2009 surveys OR
- Average Subsurface/Surface RAL concentrations > 2

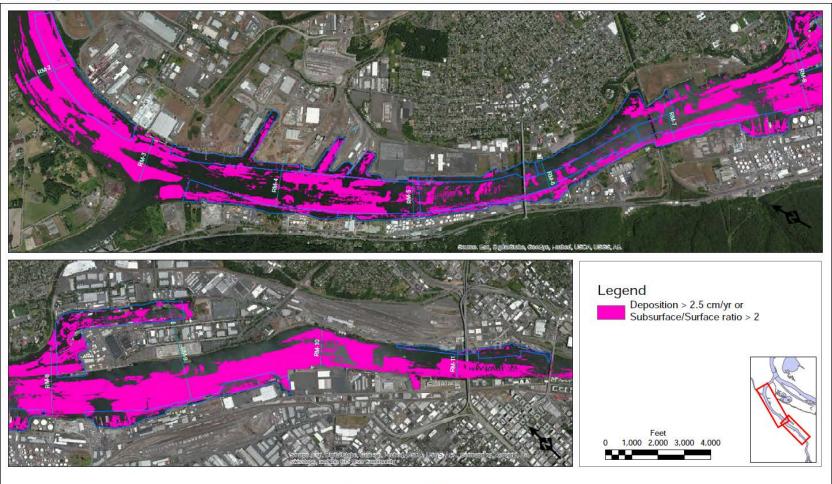
Shallow

• Shallow - <1 m at low water level, >2 feet NAVD 88

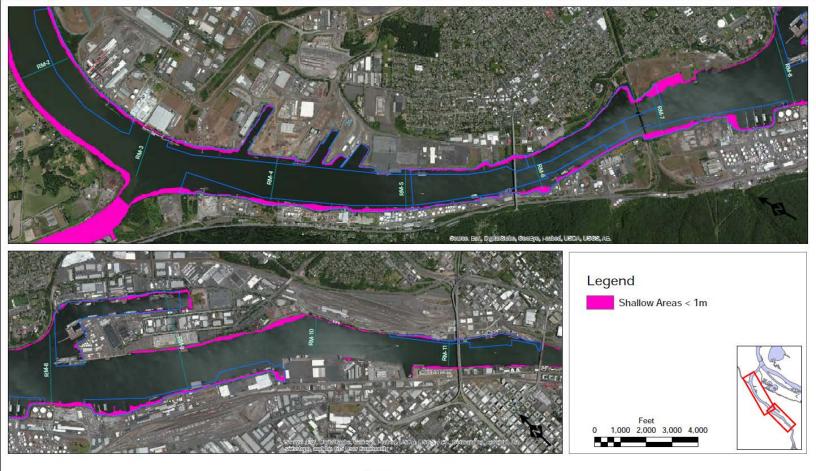
Wind/Wave Zone



Depositional



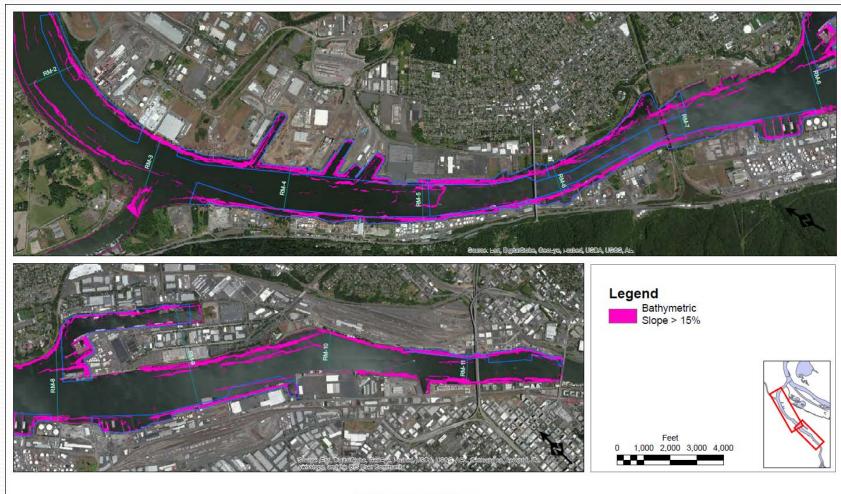
Shallow Areas



Sediment Bed Characteristics Criteria

- Slope > 15 % (Based on 2009 Bathymetry)
- Rock, Cobble, Bedrock within potential dredge prism
 - > none identified

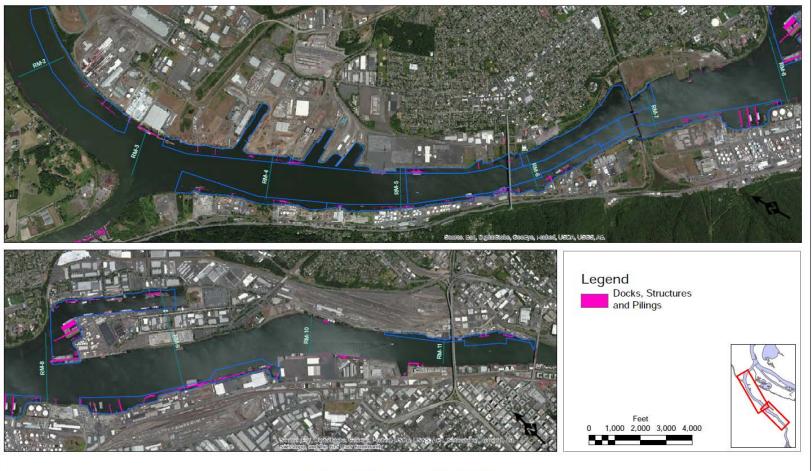
Bathymetry/Slope



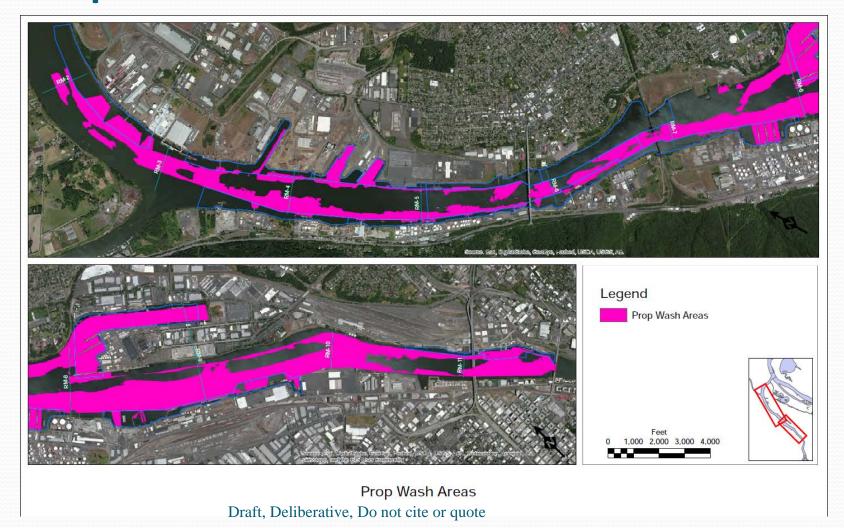
Anthropogenic Influences Criteria

- Structures and Pilings
- Prop Wash Zone
- Debris as indicated by side/scan sonar

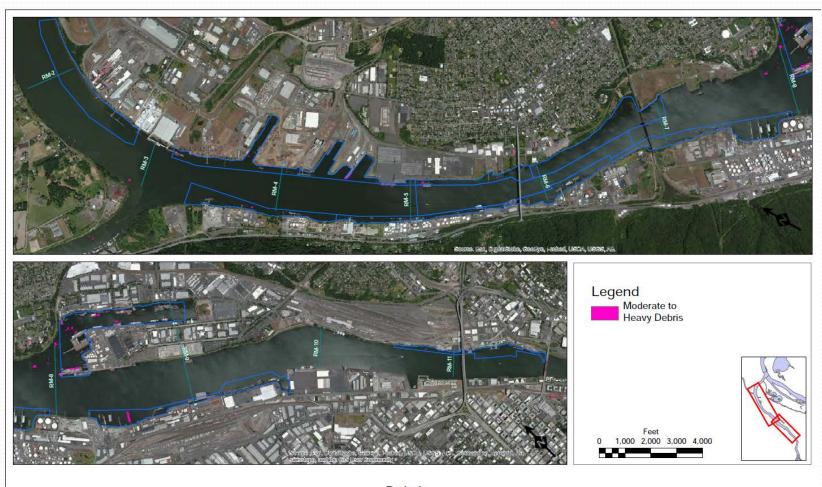
Structures and Pilings



Prop Wash Areas



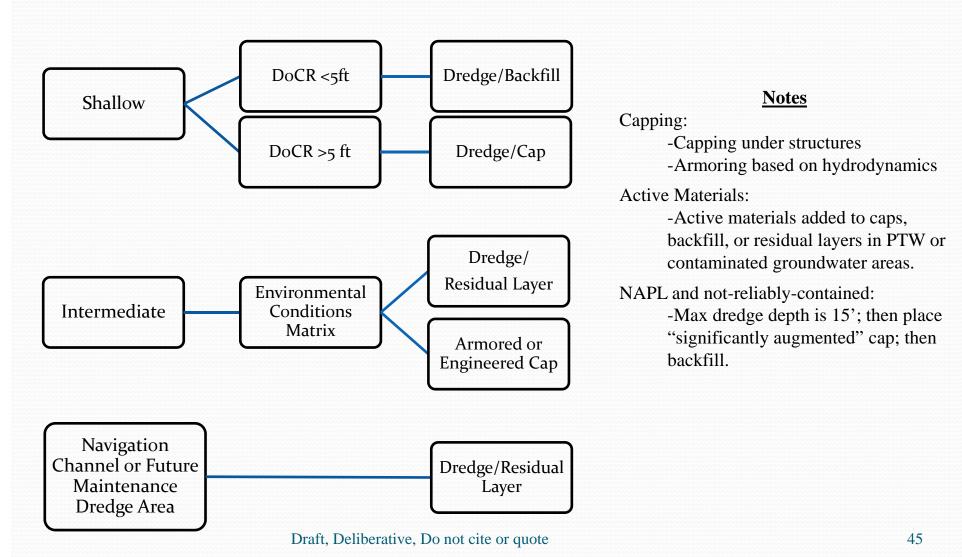
Debris



Areas for Technology Assignment

- Navigation Channel & FMD
 - Dredging
- Shallow (>4 feet NAVD88)
 - Dredge/cap
 - Armor with beach mix
- Intermediate (between Nav Channel and Shallow)
 - Dredge
 - Cap

Application of Technologies



Cap Assumptions

- 3' thick
- Physical isolation
 - Sand
- Armoring
 - 6 "beach mix in shallow
 - 12" armor stone
- Chemical isolation
 - 12-in. sand w/ 5% AC or organophilic clay
- Institutional Controls

Special Cap Considerations

- Significantly Augmented Reactive Cap
 - Chemical Isolation Layer: 12-in. sand w/ 20% AC
 - Low Permeability Layer: clay (e.g., AquaBlok)
 - Physical Isolation Layer: 18 in. sand
 - Stabilization Layer: 6 in. armor stone

Dredging Assumptions

- Equipment
 - Environmental/closed bucket
 - Articulated fixed-arm dredge w/50 feet arm
 - 2 cu yd bucket around and under structures
 - 4 cu yd bucket
- Productivity
 - 123 days/year (July 1 through October 31)
 - 24 hours/6 days per week

Dredging Assumptions (cont.)

- Accuracy
 - Natural Neighbors Geostatistical Interpolation
 - Depth based on RALs
 - Maximum dredge depth 15-19 feet
- Residuals
 - 12 in. sand
- Resuspension
 - Silt curtains
 - Rigid containment NAPL (<50 ft water)

Treatment Assumptions

- PTW and groundwater plumes
- In-situ Treatment
 - Activated carbon
 - Organophilic clay
 - Solidification/stabilization (under structures)
- Ex-situ Treatment
 - Based on disposal decision tree
 - Thermal desorption

Principal Threat Waste

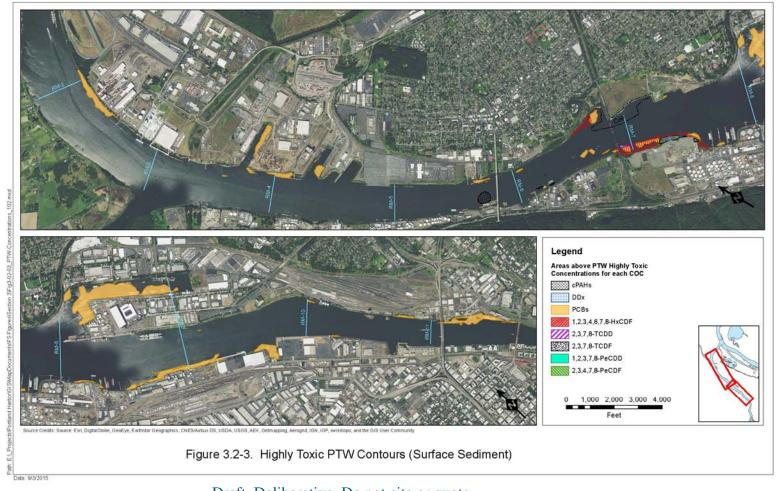
- Source Material NAPL
 - Chlorobenzene Arkema
 - PAHs Gasco
- Highly Toxic exceeds 10⁻³
 - PCBs
 - cPAHs
 - DDx
 - 2,3,7,8-TCDD
 - 2,3,7,8-TCDF
 - 1,2,3,7,8-PeCDD
 - 2,3,4,7,8-PeCDF
 - 1,2,3,4,6,7,8-HxCDF

- > 200 µg/kg
- > 100,000 μg/kg
- > 7000 µg/kg
- $> 0.02 \mu g/kg$
- $> 4 \mu g/kg$
- $> 0.01 \, \mu g/kg$
- $> 0.4 \mu g/kg$
- $>0.3 \mu g/kg$

PTW – Reliably Contained

Contaminant	PTW Contaminants Reliably Contained				
Dioxins/Furans	Can be reliably contained				
PAHs	Can be reliably contained				
Chlorobenzene	<320 μg/kg				
DDx	Can be reliably contained				
Naphthalene	<140,000 μg/kg				
PCBs	Can be reliably contained				

PTW Footprint



Ex-situ Treatment Assumptions

- NAPL & PTW Not Reliably Contained
 - Chlorobenzene
 - Napthalene
 - PAHs
 - DDx mixed with chlorobenzene
- Treatment Method
 - Thermal Desorption

EMNR Assumptions

- Swan Island Lagoon
 - Outside SMAs
 - 12 in. sand
- Institutional Controls

Remaining Areas

- In-situ treatment for PTW
 - Only if depositional area
 - Activated carbon
- MNR
 - Deposition
 - Dispersion
- Institutional Controls

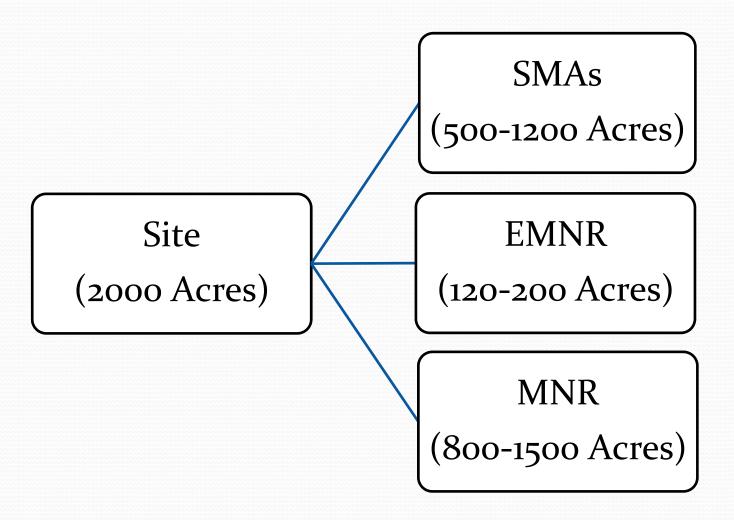
Institutional Control Assumptions

- Whole River
 - Fish consumption advisories
- Capped Areas
 - Waterway Use Restrictions or Regulated Navigation Areas (RNAs)
 - Land Use/Access Restrictions
- EMNR Areas
 - Land Use/Access Restrictions

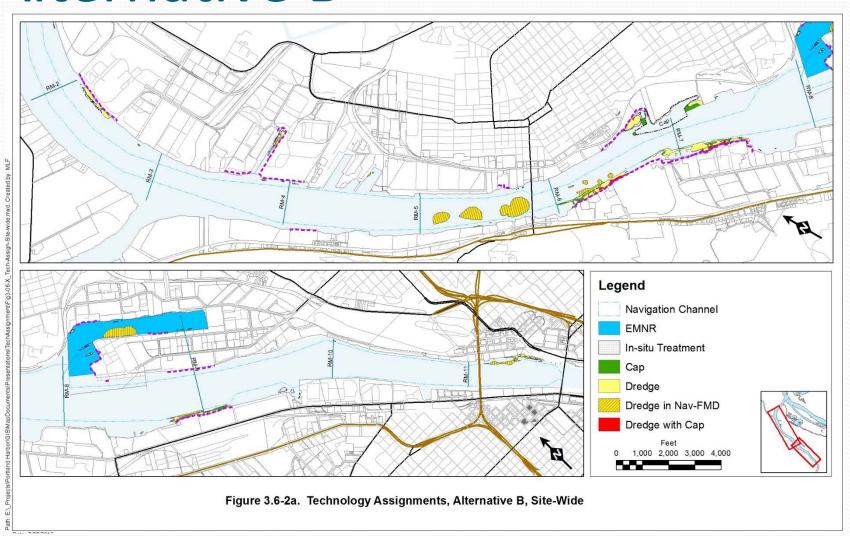
Summary of Technology Assignments

Alt	Dredge Volume	Dredge Areas	Dredge/Cap Areas	Cap Areas	In-Situ Areas	Ex-Situ Volume	EMNR	MNR ³	Disposal	Years to Const.
	(Cu Yd)	(Acres)	(Acres)	(Acres)	(Acres)	(Cu Yd)	(Acres)	(Acres)		
В	782,620	67	17	23	7	464,883	96	1,962	DMM 2	4
С	950,324	83	19	30	5	464,883	94	1,945	DMM 2	4
D	1,285,223	129	23	45	3	464,883	82	1,899	DMM 2	5
Е	2,147,429	191	38	66	0	464,883	54	1,838	DMM 1 DMM 2	7
F	4,643,695	362	61	118	0	464,883	22	1,638	DMM 1 DMM 2	12
G	7,435,061	477	78	185	0	464,883	13	1,396	DMM 1 DMM 2	18

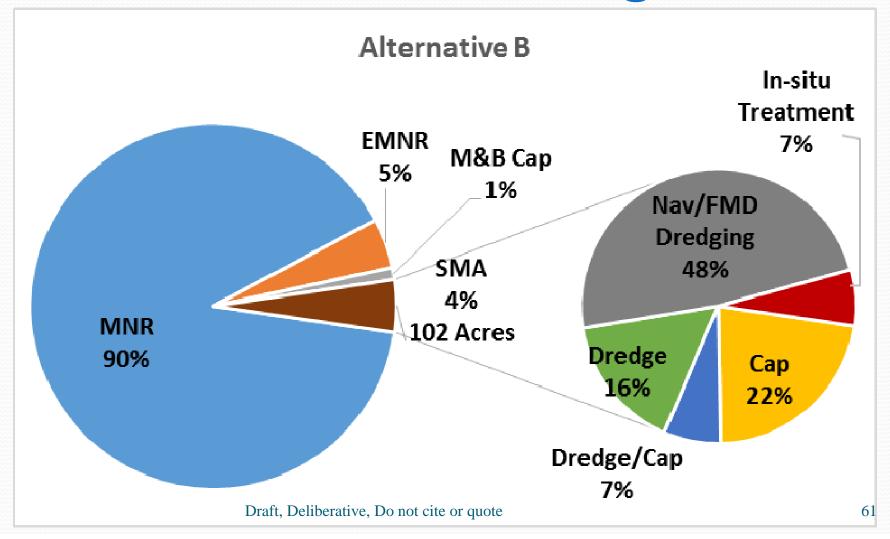
Summary of Technology Assignments



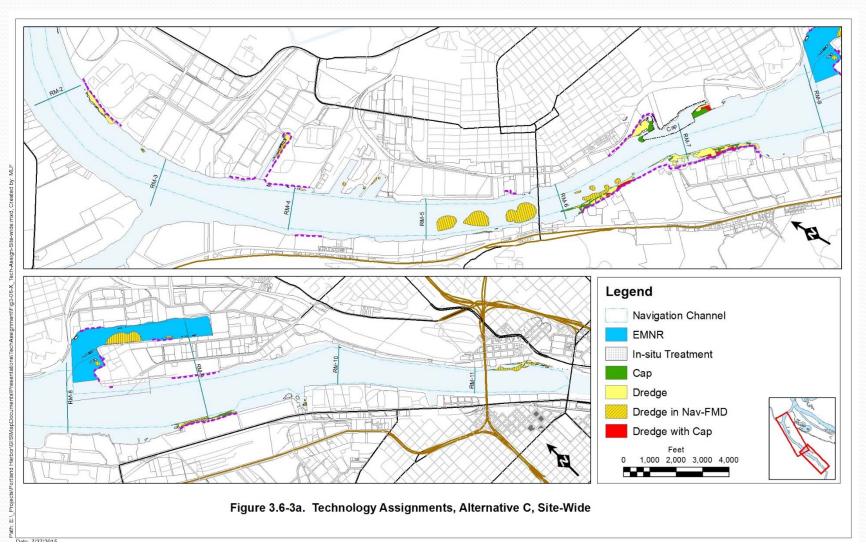
Alternative B



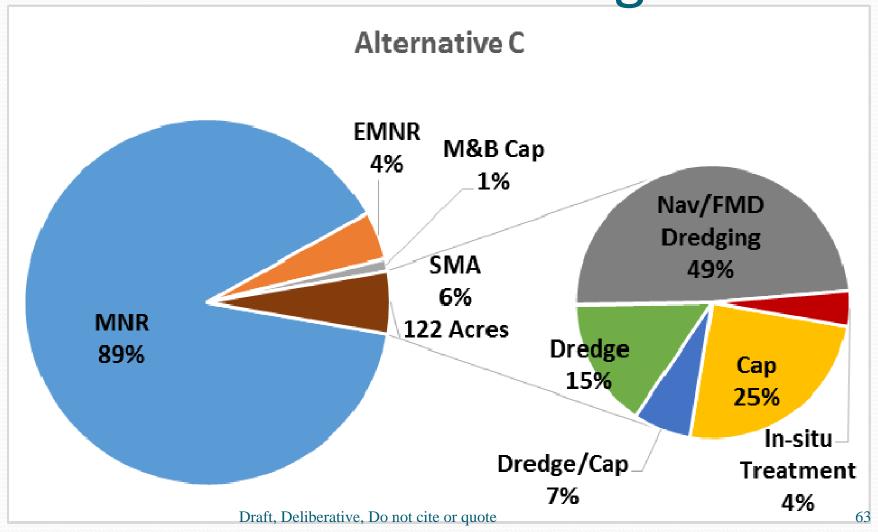
Alternative B Technologies



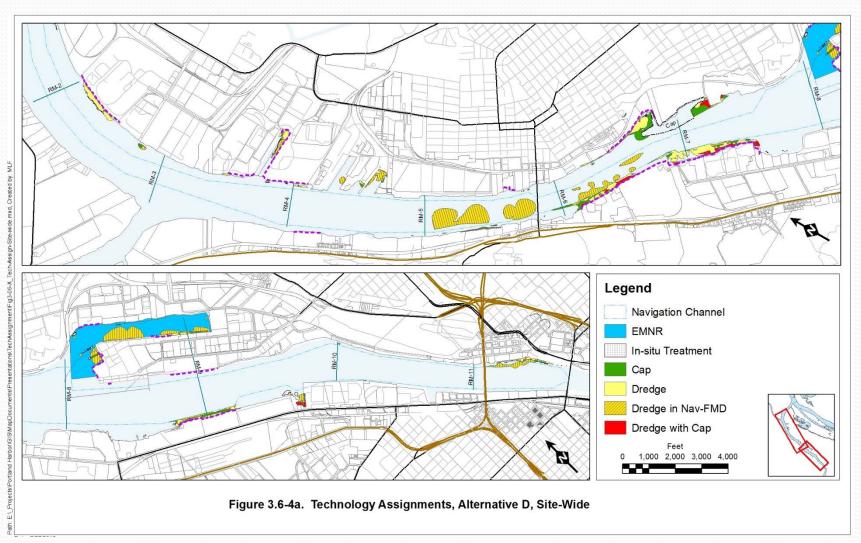
Alternative C



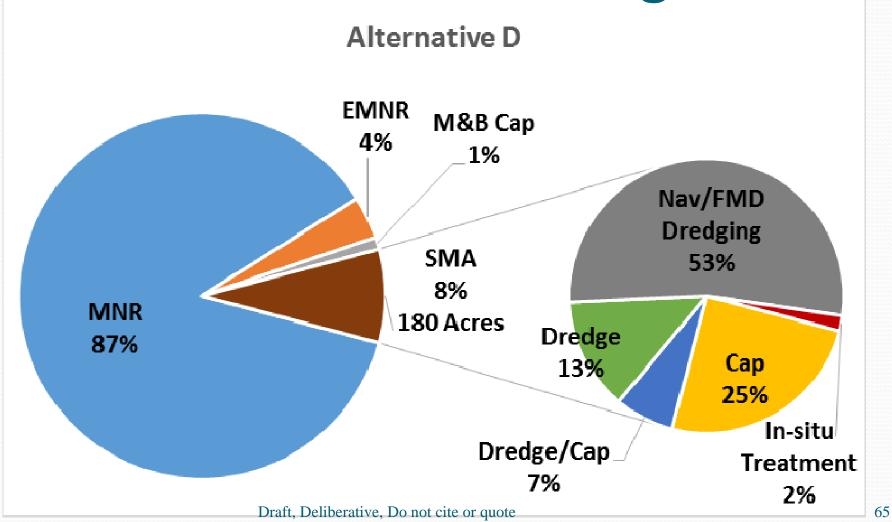
Alternative C Technologies



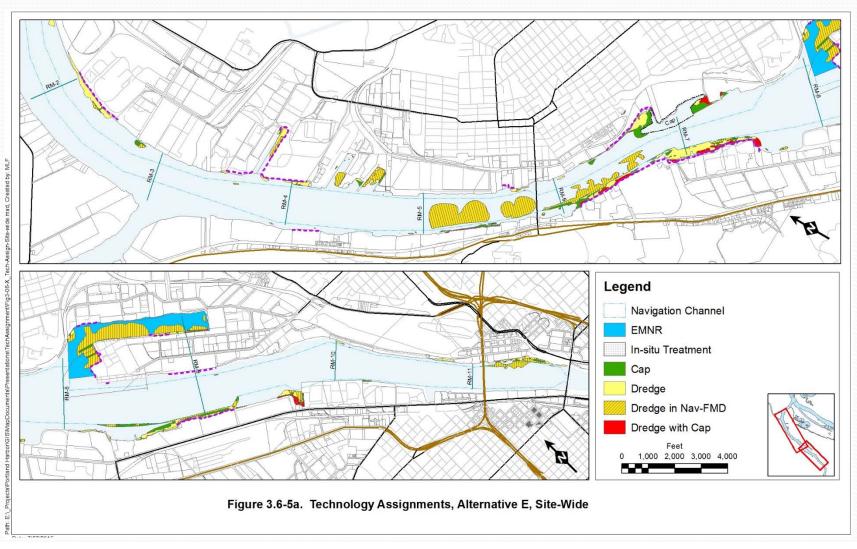
Alternative D



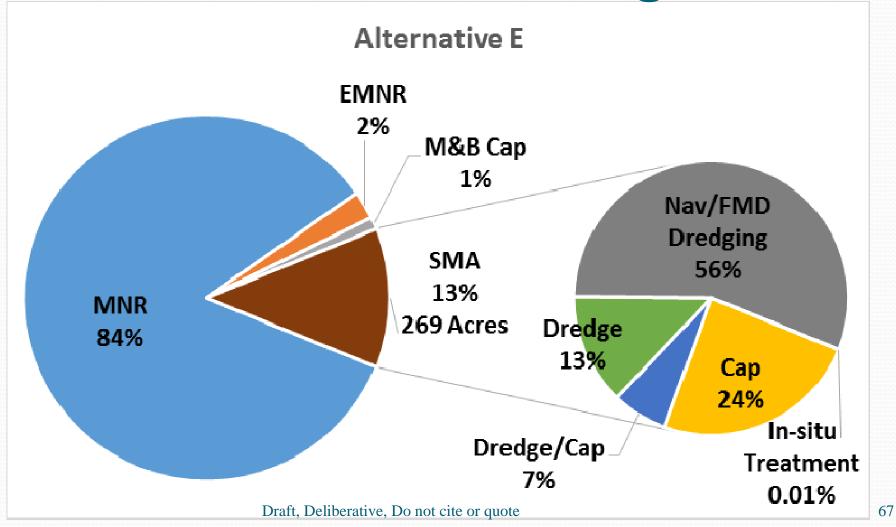
Alternative D Technologies



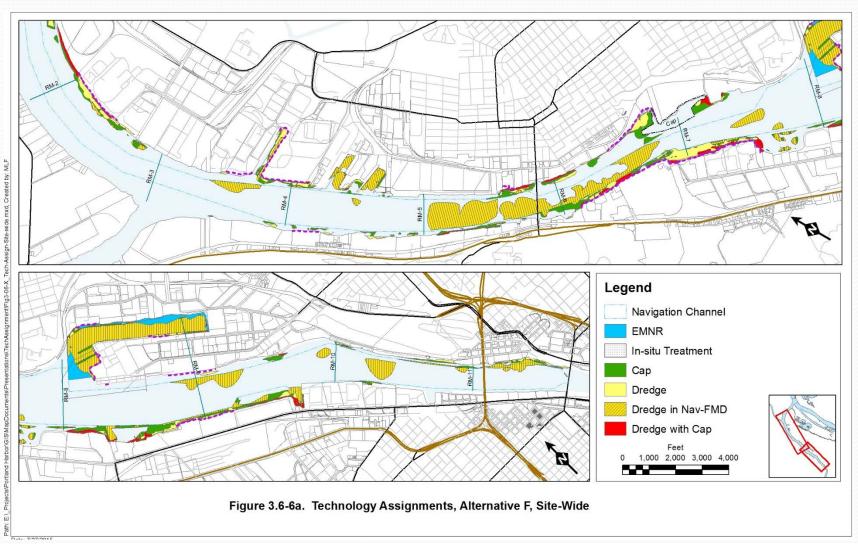
Alternative E



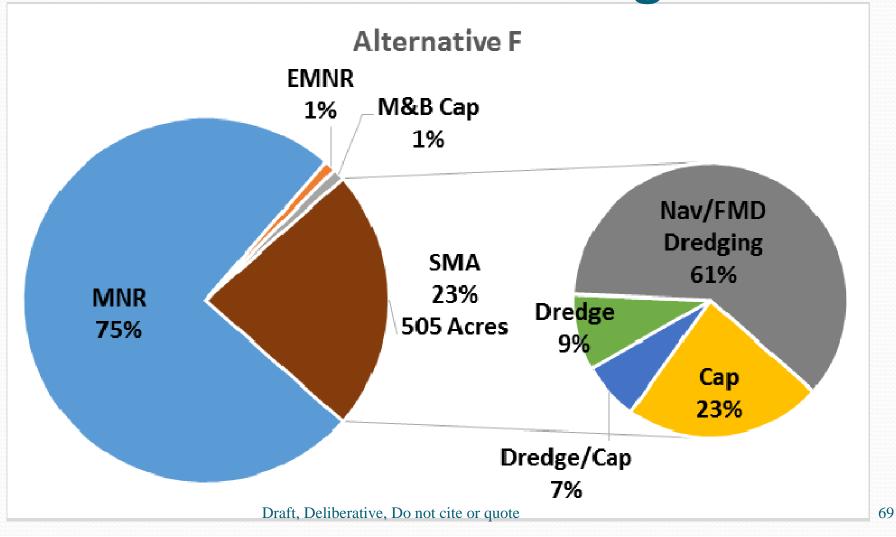
Alternative E Technologies



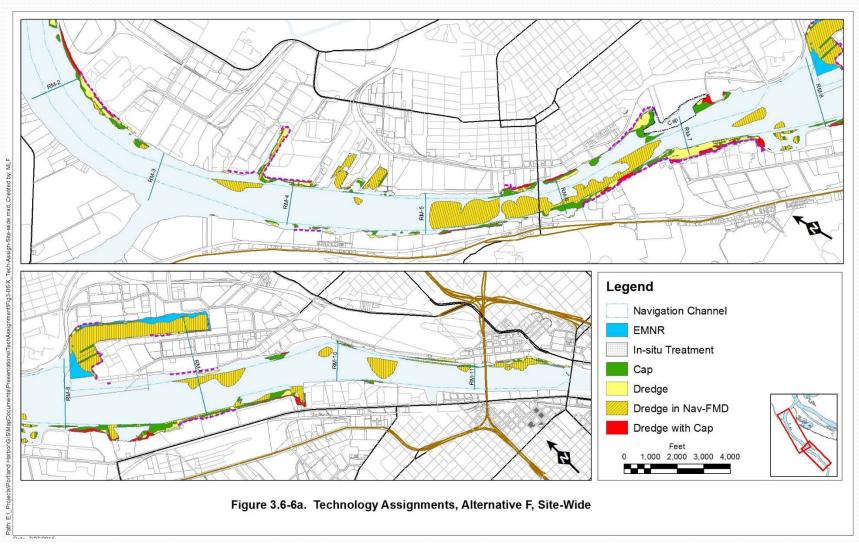
Alternative F



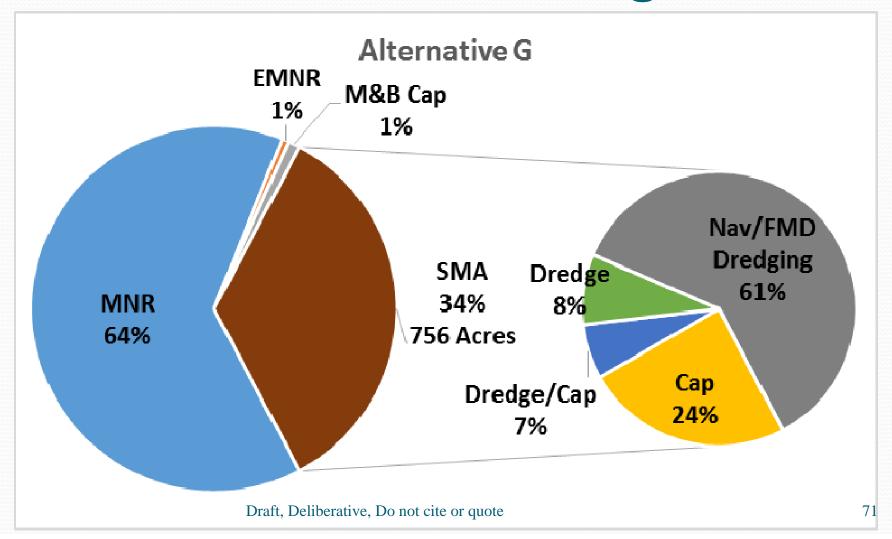
Alternative F Technologies



Alternative G



Alternative G Technologies



Screened Alternatives

- Alternative C
 - Essentially same as Alternative B
 - 0.1% increase in overall acres remediated
 - 8.7% reduction of focused COC concentrations

Portland Harbor Detailed Analysis of Alternatives

Site Areas

- Based on receptors
- Account for receptor mobility
- Focus on high concentration areas
- Delineate areas of capping/dredging

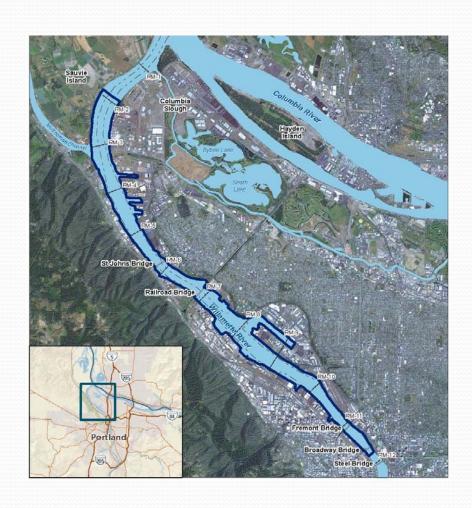
Site-wide

Example Receptors

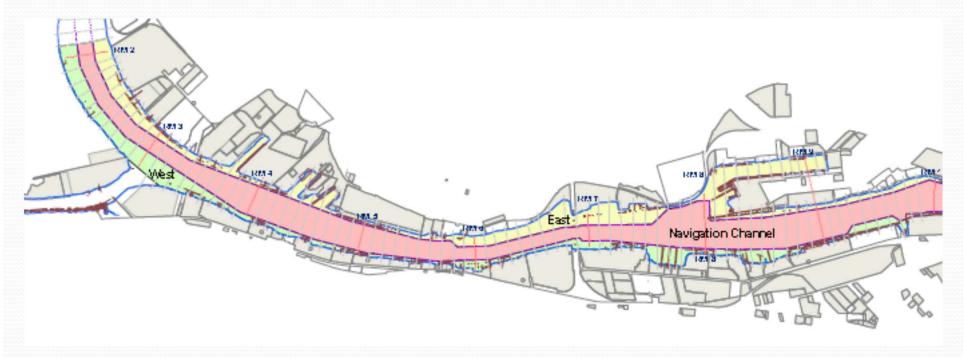
- Subsistence & Tribal Fishers
- Large-home range Fish
- Bald Eagle

Size

- ~10 RM
- 2,190 Acres



River Zones



- East Nearshore Zone
- West Nearshore Zone

- Navigation Channel
- Swan Island Lagoon

0.1 to 0.2 River Mile

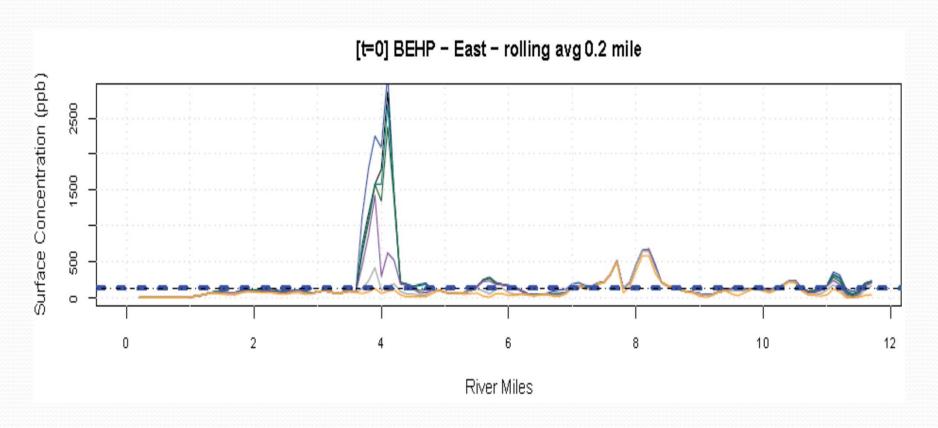
Example Receptors

- Sculpin
- Crayfish
- Benthic

Size

Rolling o.2 RM in River Zones

Example Rolling 0.2 RM



0.5 River Mile

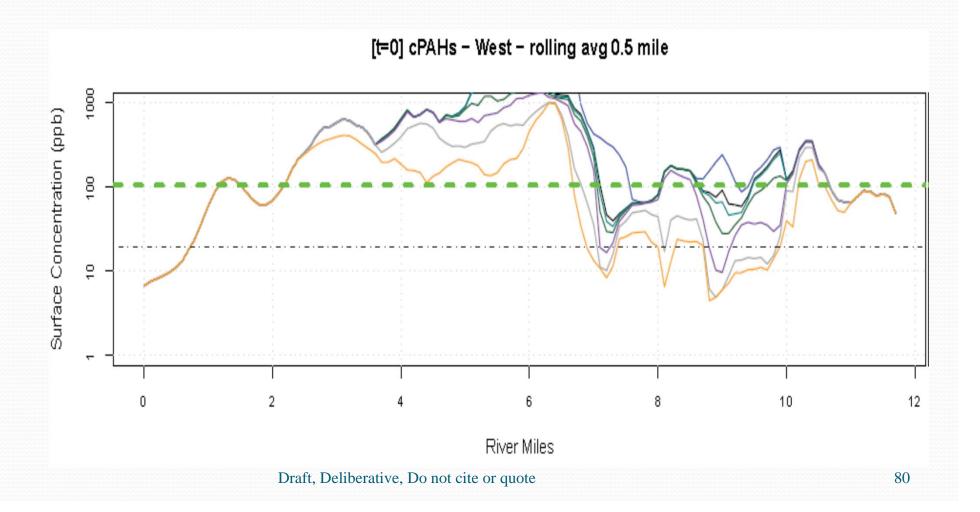
Example Receptors

Human Direct Contact (nearshore only)

Size

Rolling ½ RM in River Zones

Example Rolling 0.5 RM



1 River Mile

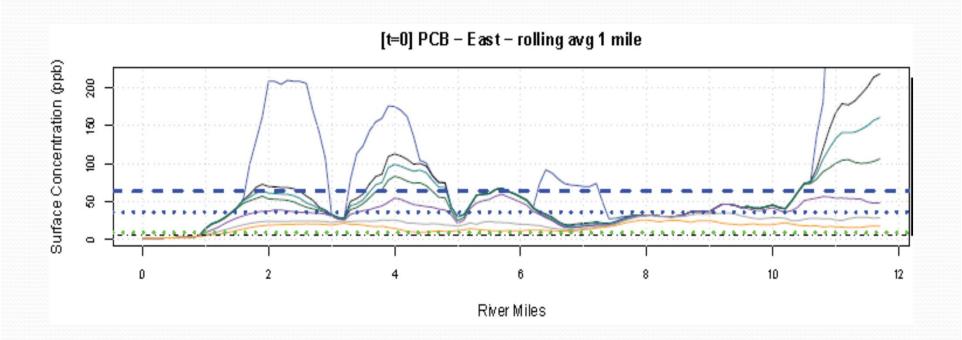
Example Receptors

- Recreational Fishers
- Smallmouth Bass
- Mink
- Osprey

Size

- Rolling RM in River Zones
- SDUs

Example Rolling 1 RM



Sediment Decision Units

Develop a spatial basis for evaluating remediation

- River Zones
- Centered on contaminant high concentration areas

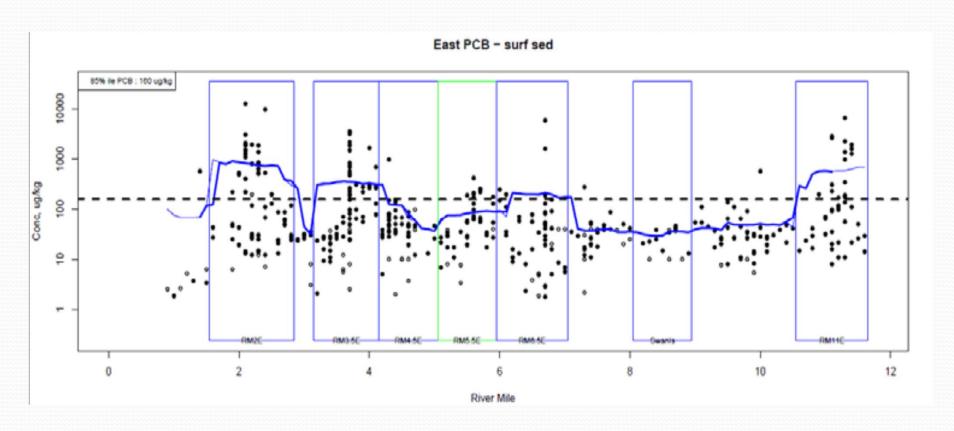
Goal

- Reproducible and spatially-based
- Evaluate highest risk reduction

SDU Approach

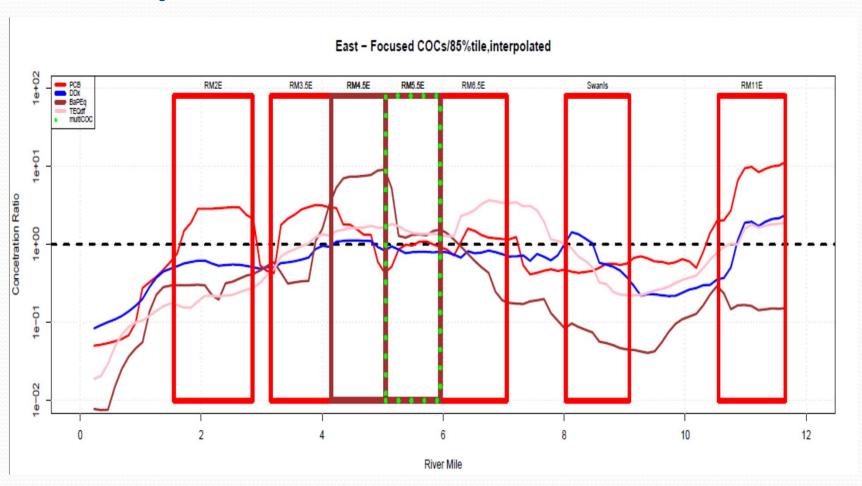
- Delineate highest concentration areas
- Based on river region
- Non-weighted surface sediment concentrations
 - Focused COCs
- Adjust SDU boundaries
 - interpolated concentration contours
- Other considerations
 - benthic risk
 - other COCs

Example Rolling RM

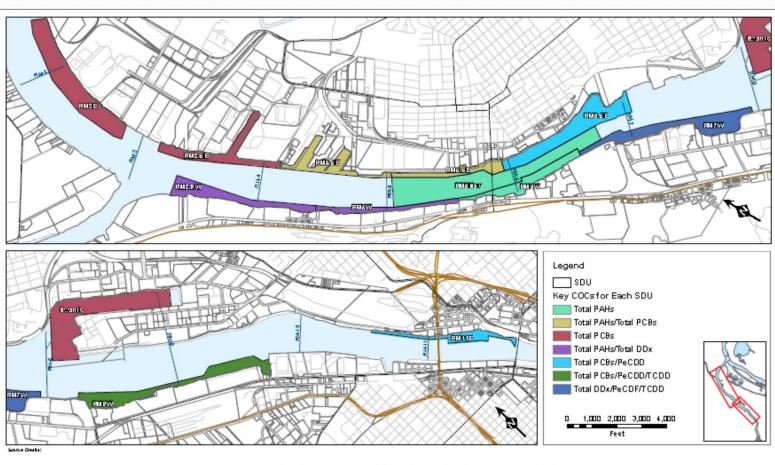


Note: All SDUs shown, not just PCB related ones

Example 85% Normalization



Resulting SDUs



Overall Protection of Human Health and the Environment

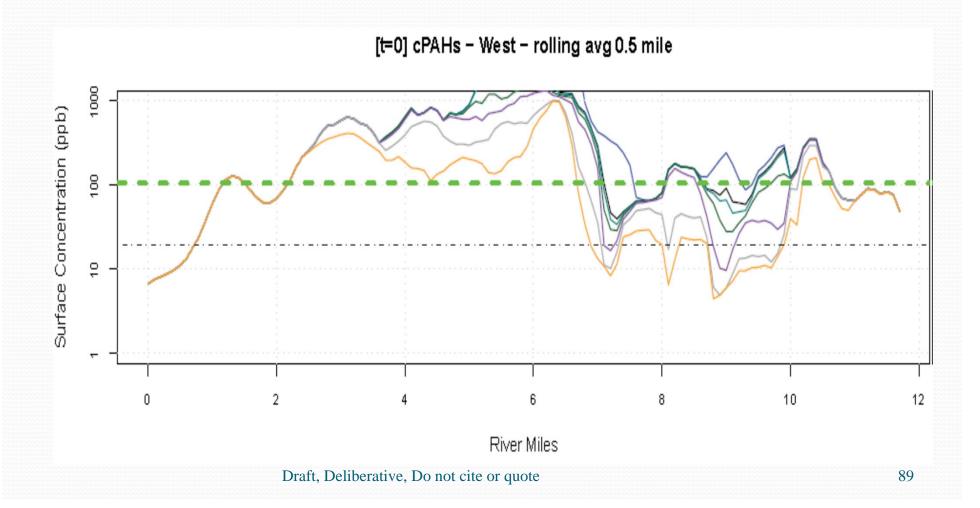
Human Health

- RAOs 1 & 2
 - Compare to PRGs
 - Residual risk
- RAOs 3 & 4
 - Qualitative

Ecological

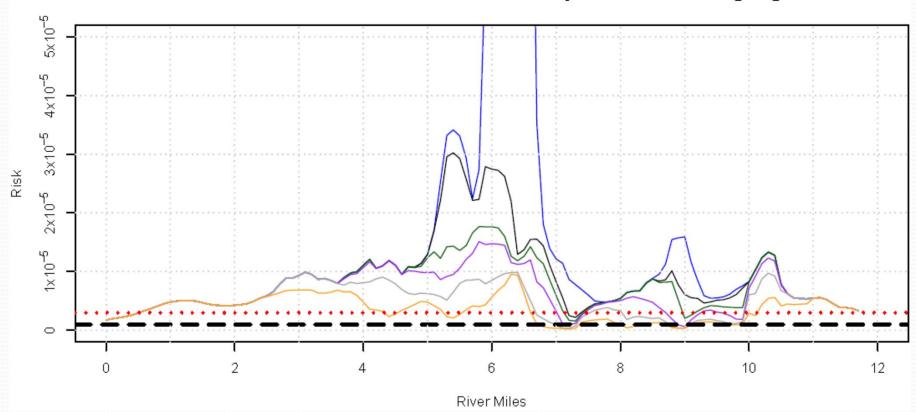
- RAOs 5 & 6
 - Compare to PRGs
 - Residual risk
- RAOs 7 & 8
 - Qualitative

RAO 1 – Compare to PRG

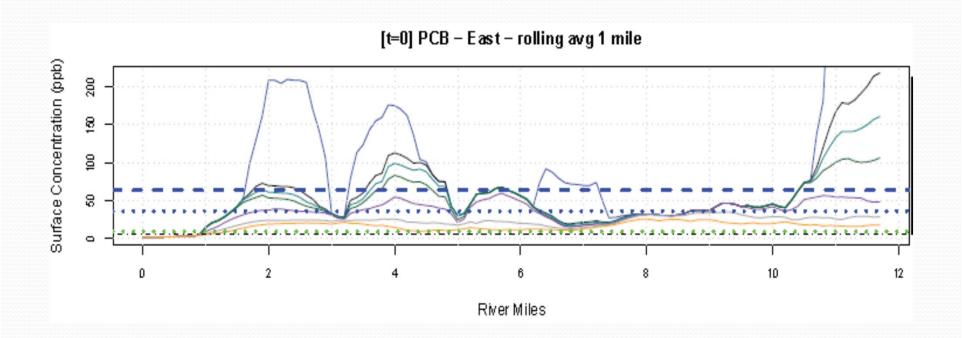


RAO 1 – Residual Risk (cancer)

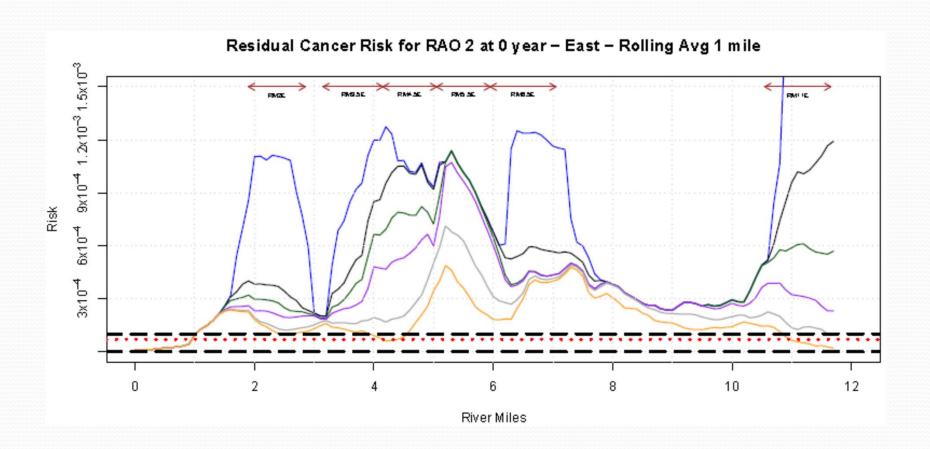
Residual Human Health Cancer Risk for RAO 1 at 0 year - West - Rolling Avg 0.5 mile



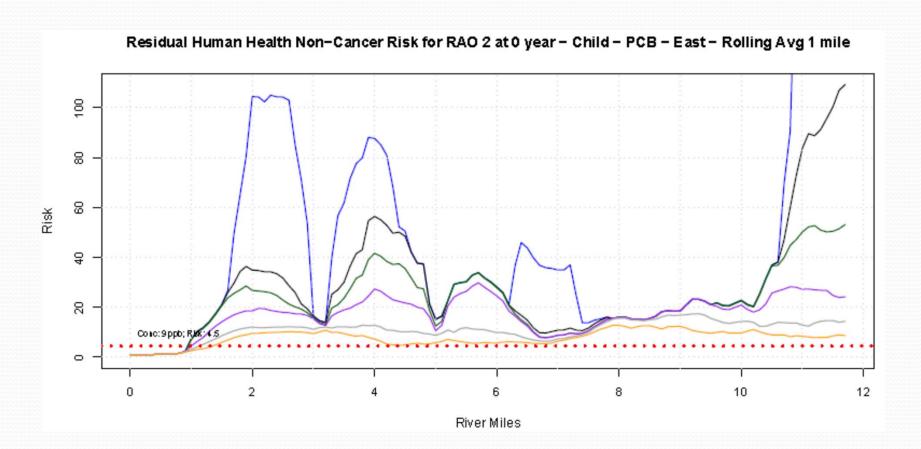
RAO 2 – Compare to PRG



RAO 2 – Residual Risk (cancer)

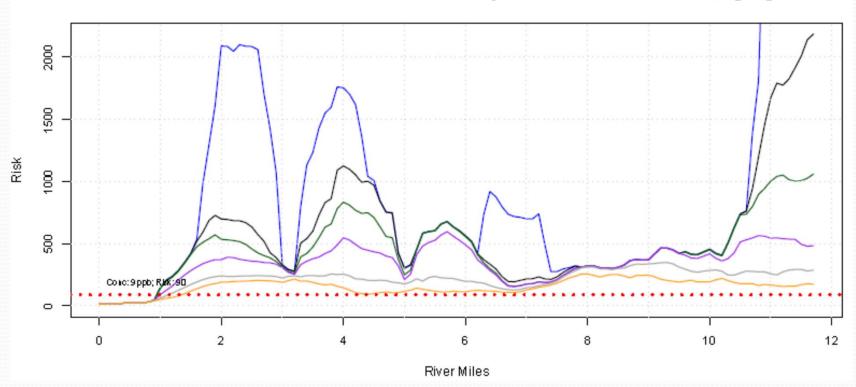


RAO 2 – Residual Risk (child)

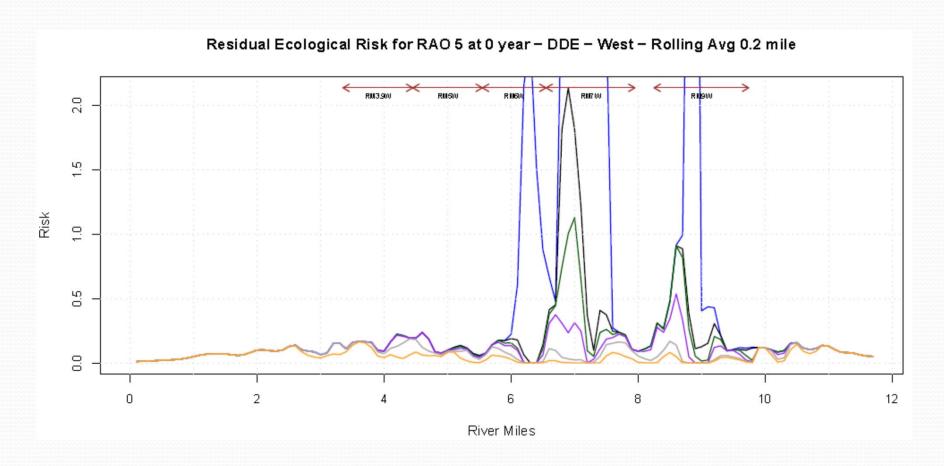


RAO 2 – Residual Risk (infant)

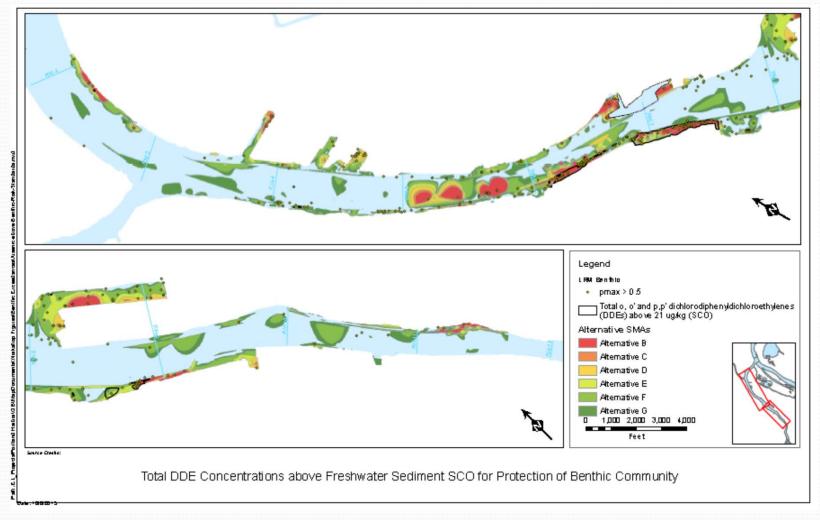
Residual Human Health Non-Cancer Risk for RAO 2 at 0 year - Infant - PCB - East - Rolling Avg 1 mile



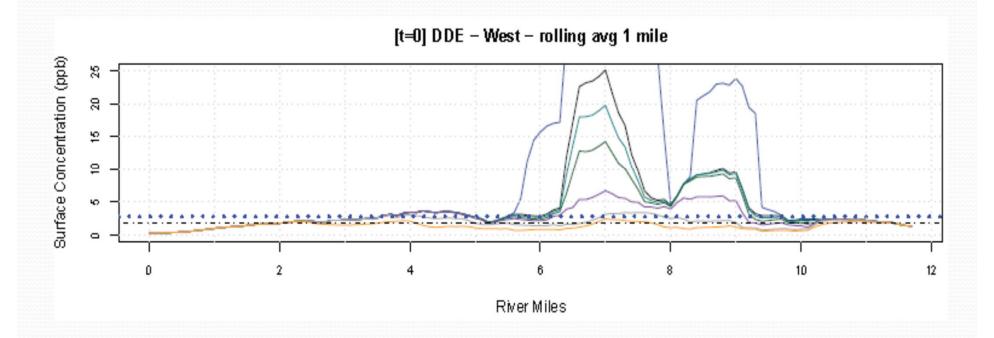
RAO 5 – Benthic Risk



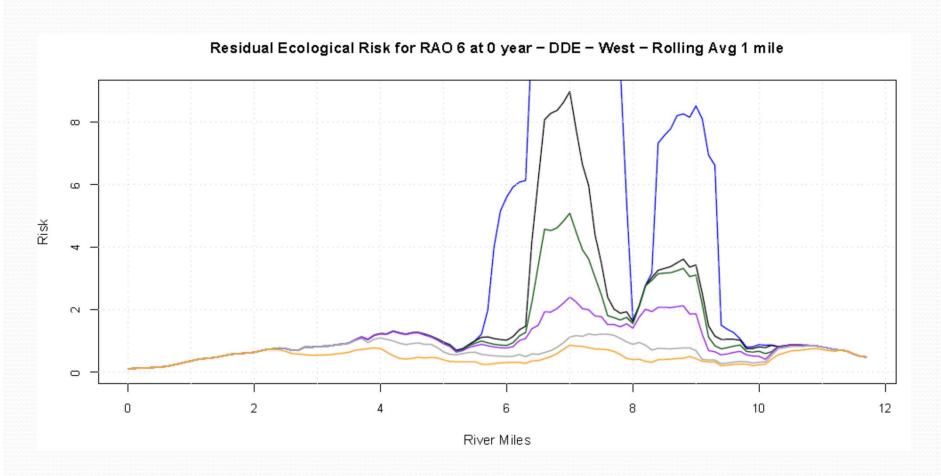
RAO 5 – Benthic Risk Areas (DDE)



RAO 6 – Compare to PRG



RAO 6 – Residual Risk



- Chemical specific ARARs
 - AWQCs national and state
 - Assumed all sources were controlled
 - Assumed MNR will meet sediment PRGs
 - ➤ If PRGs met in surface sediment, would not contribute to exceedance
 - MCLs
 - Assumed all groundwater plumes controlled
 - Assumed Reactive caps to deal with residuals
 - WA Freshwater Sediment Benthic Risk
 - Ensure benthic risk due to CERCLA COCs addressed
 - Oregon Cleanup Laws
 - Meet at construction complete or with MNR
 - ▶ PRGs set at 10⁻⁶, HQ=1, or background
 - Need ICs for background

- Action specific ARARs
 - CWA 404
 - Clean fill requirements for material
 - Mitigation
 - Required for all armored caps
 - Dredge/cap in nearshore
 - Beach mix nearshore and banks
 - Layback bank slope
 - Rivers & Harbors
 - No caps in federal navigation channel
 - Remove high concentration contamination

- Action specific ARARs (cont.)
 - ODFW Management Plan (TBC)
 - Operations within work window (July 1 through October 31)
 - Disposal
 - Oregon Pesticide Rule
 - Oregon Solid Waste Rule
 - RCRA OR delegated state
 - > TSCA
 - CAA
 - Ensure emissions requirements during removal

- Location specific ARARs
 - ESA & EFH
 - Actions will not impede migration
 - Actions will not degrade habitat
 - FEMA
 - > Net zero elevation in nearshore areas
 - NHPA & Indian Graves
 - No known areas
 - > Artifacts are present throughout
 - Requirements during removal

Long-term Effectiveness and Permanence

- Magnitude of Residual Risk
 - Human Health
 - Rolling river mile by three zones
 - Cancer risks for adult
 - > Non-cancer hazards for child and infant
 - Ecological
 - > Same as HH
 - Most sensitive receptor
- Adequacy and Reliability of Controls
 - Engineering and Institutional Controls
- Repairs, Maintenance and Remedy Replacement

Time to RAOs

- No Model!!!
- Too many flaws with PRP model
 - Did not correlate with delta bathymetry
 - No action curve over-predictive
 - Did not match CSM
 - PRPs unwilling to fix problems
- Tried SedCam Model
 - Too simple
 - Need more than one sedimentation rate in large system
 - No action curve over-predictive
 - Did not match CSM
- Working with USACE (Earl) to fix PRP model

Costs

Alternative	Total Capital Cost	Total Annual O&M Cost	al Periodic Non-discoun		Present Value Cost	
A	\$ 0	\$ 0	\$ 0	\$ 0	\$o	
В	\$703,906,000	\$ 0	\$337,522,000	\$1,041,428,000	\$790,870,000	
D	\$1,023,004,000	\$ 0	\$460,170,000	\$1,483,174,000	\$1,105,550,000	
Е	\$1,452,748,000	\$ 0	\$651,834,000	\$2,104,582,000	\$1,490,610,000	
F	\$2,388,798,000	\$ 0	\$803,150,000	\$3,191,948,000	\$2,053,600,000	
G	\$3,355,667,000	\$ 0	\$977,724,000	\$4,333,391,000	\$2,446,450,000	

Cost

- Major Point of Contention
- PRPs do not want costs underestimated for allocation
- PRPs want cost low
- Mitigation...cost too high
 - 14% capital costs alt B
 - 58 acres alt B
- Subtitle C
 - 45% capital costs alt B
- Dredging unit costs (from LWG 2012)
 - \$38.03/cy open water
 - \$53.66/cy confined

FS Section 4

Comparative Analysis

Qualitative Comparative Analysis

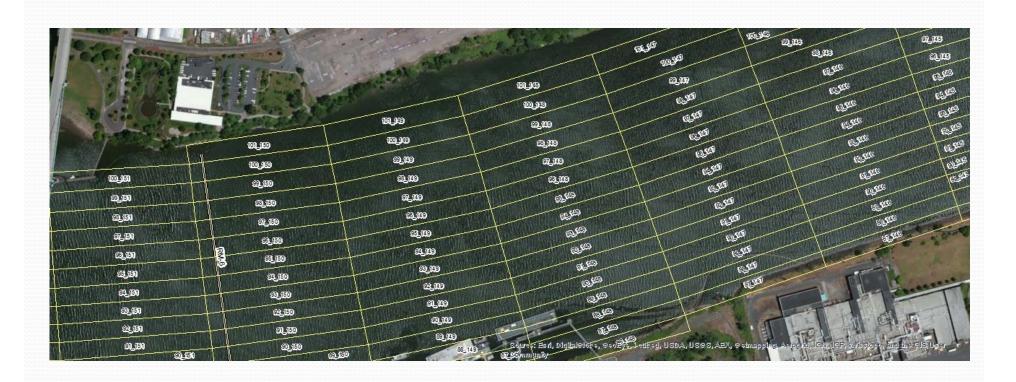
Remedial Alternative	Description	Threshold Criteria		Balancing Criteria				
		Overall Protection of Human Health and the Environment	Compliance with ARARs	Long-Term Effectiveness and Permanence	Reduction of Toxicity, Mobility, or Volume through Treatment	Short-Term Effectiveness	Implementability	Present Value Cost (Dollars)
		C	ontaminated Sedim	ent Alternatives				
А	No Action/No Further Action	_	_	NA	NA	NA	NA	NA
В	Dredge 83 acres; Contain 4 acres	+	+	0	•	•	•	\$
	Dredge/Cap 3 acres; EMNR 103 acres							
В	MNR 2,250 acres; In-situ 7 acres							
	Ex-situ 321,120 cy; Disposal 892,000 cy							
D	Dredge 161 acres; Contain 7 acres	+	+	•	•	G	•	\$
	Dredge/Cap 6 acres; EMNR 88 acres							
	MNR 2,185acres; In-situ 3 acres							
A	Ex-situ 395,060 cy; Disposal 1,766,000 cy							
E	Dredge 249 acres; Contain 10 acres	+	+	•	•	•	•	\$\$
	Dredge/Cap 10 acres; EMNR 60 acres							
	MNR 2,121 acres; In-situ 0 acres							
	Ex-situ 431,560 cy; Disposal 3,100,000 cy							
F -	Dredge 479 acres; Contain 18 acres	+	+	•	•	•	•	\$\$\$
	Dredge/Cap 17 acres; EMNR 24 acres							
	MNR 1,913 acres; In-situ 0 acres							
	Ex-situ 495,830 cy; Disposal 7,115,000 cy Dredge 741 acres; Contain 22 acres							
G	Dredge/Cap 18 acres; EMNR 15 acres	+	+	•	•	•	0	\$\$\$\$
	MNR 1,655 acres; In-situ 0 acres							
	Ex-situ 518,010 cy; Disposal 11,722,000 cy							

Portland Harbor Modeling MNR

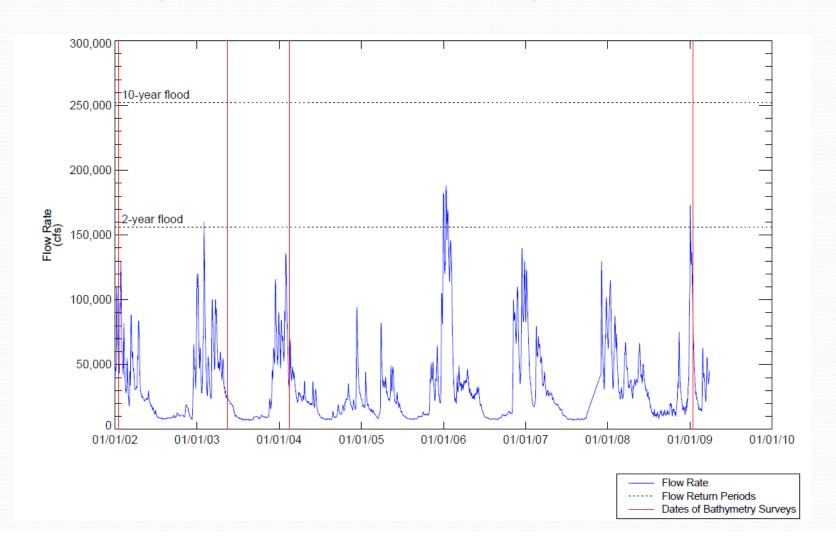
LWG hydrodynamic and sediment transport (HST) model

- Submitted in draft FS (2012)
- Used channel flow (EFDC) and channel sediment transport (SEDZLJ)
- Rejected by EPA
 - Models not coupled
 - Calibration was only for bathymetry, not chemistry
 - Complex system
 - Tidal fluctuations
 - Reverse flows
 - Did not account for bedload transport
 - Does not match CSM

Model Grid Cells Example



Bathymetric Surveys

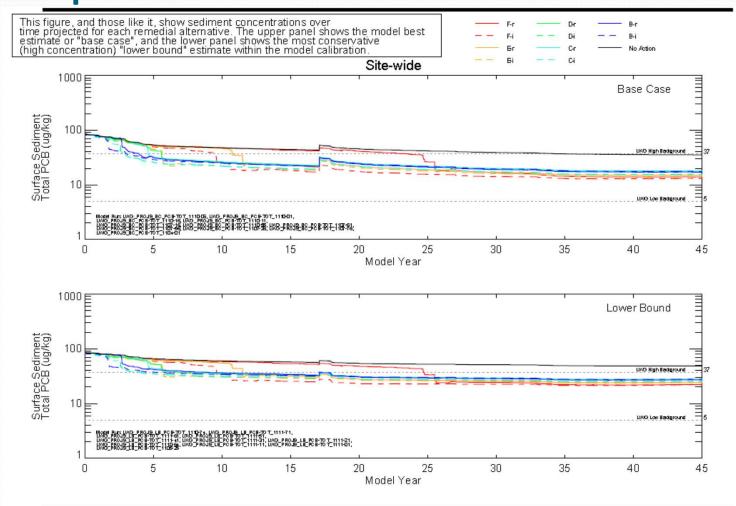


t>0 discussion

• LWG Model performance vs. Bathymetry graphs



Example of LWG Model Prediction





This document is currently under review by USEPA and its federal, state, and this la partners, and is subject to change, in whole or in part.

Draft, Deliberative, Do not cite or quote Time Series of Surface Sediment (Top 1-ft) Total PCB Concentrations (Site-wide Average)

Figure 8.2.2-1 Portland Harbor RI/FS Draft Feasibility Study Simulation of FS Alternatives

Portland Harbor High-biasing Non-detects in Data Set

Example of High-biasing ND Hexachlorobenzene

